



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

May 4, 2015

Tom Montoya  
Forest Supervisor  
Wallowa-Whitman National Forest  
1550 Dewey Avenue  
Baker City, Oregon 97814

Dear Mr. Montoya:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed **Invasive Plant Treatment** project (EPA Project Number 06-022-AFS) on Wallowa-Whitman National Forest (WWNF) in Wallowa, Baker, Malheur and Grant Counties in Oregon and Adams and Nez Perce Counties in Idaho. Based on our review, we are assigning a rating of LO (Lack of Objections) to this DSEIS. A copy of the EPA's rating system used in conducting our review is enclosed for your reference.

The DSEIS evaluates potential cumulative effects of the proposed project, which is to treat invasive plants across the WWNF for the next 15 years using integrated manual, mechanical, herbicide, cultural treatments, and early detection and rapid response process. The DSEIS also addresses the project's compliance with the Pacific Anadromous Fish (PACFISH)/Inland Native Fish (INFISH) programs that guide management of riparian habitats to protect native fish. Analyses in this DSEIS, therefore, include only new or modified data since publication of the previous final EIS for the project relative to the two topics (cumulative effects and PACFISH/ INFISH compliance). All other project activities and features remain the same, including the Preferred Alternative B. Based on comments received on this DSEIS, the Forest Service (FS) will issue a new Record of Decision for the project.

Our comments on the previous draft EIS for this project in April 2009 indicated that our primary concern was the potential of the project to impact water quality due to herbicide applications, especially near 303(d) listed streams. In June 2010, we reviewed the final EIS for the project and found that it was responsive to our comments. We believe that this DSEIS provides an adequate discussion of potential cumulative effects from this and other ongoing activities and reasonably foreseeable actions in the project area and includes measures to reduce potential adverse effects. We believe that information in the DSEIS also demonstrates how the project would be implemented in a manner consistent with PACFISH/INFISH goals and standards (p. 84).

Although we have no serious concerns at this time, we offer the following recommendations to strengthen the environmental protection aspects of the project:

- Continued work with Idaho and Oregon Departments of Environmental Quality and tribes affected by the project to ensure that the state and tribal water quality standards will be met throughout the proposed project period; and where those standards are currently being met, the project does not degrade water quality. We expect adherence to prescribed buffers (i.e., 300 feet on all fish-bearing streams and 150 feet on streams without fish) to prevent pollutants from entering water courses. We note with appreciation that proposed and ongoing restoration activities, in addition to similar actions taken by the Tri-County Cooperative Weed Management Area participants, will contribute positively to water quality restoration within water bodies on WWNF.
- Continued work with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, as well as the Idaho Department of Fish and Game and Oregon Department of Fish and Wildlife as appropriate, to monitor risks to species and take corrective measures as needed to protect biota and habitat during implementation of this project. The final SEIS should include any additional relevant information developed as a result of further coordination with these agencies, particularly outcomes of consultations with the agencies and recommended measures to protect newly designated or listed sensitive plant and wildlife species (p. 118, 169).
- Regarding impacts of climate change, the DSEIS states that, “while climate change may provide more favorable conditions for noxious weeds over the long-term, determining a quantifiable effect on how this would change the effects that noxious weeds exude on sediment and temperature is immeasurable (p. 79)”; and that, “cumulative effects to human health from climate change cannot be discerned at the project level (p. 96).” We believe that the EIS would be strengthened by including additional information. Therefore, we recommend FS:
  - Consider approaches for climate impact assessment outlined in the Council on Environmental Quality’s recent “*Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts*”<sup>1</sup> and include relevant information in the final SEIS.
  - Include estimates of greenhouse gas emissions (e.g., from vehicular or aerial traffic) in the final SEIS and practicable mitigation practices for reducing them during the proposed project period (15 years), such as using energy efficient equipment.

Thank you for the opportunity to review this DSEIS. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Rating System For Draft Environmental Impact Statements

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<sup>1</sup> <https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.